

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:

Aluminum Recovery Technologies Inc.
2170 Production Road
Kendallville, IN 46755

ATTENTION:

Farrell Norman
General Manager

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Aluminum Recovery Technologies Inc. (ART or You) to submit certain information about the facility at 2170 Production Road, Kendallville, IN. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within **30 calendar days** after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

ART owns and operates an emission source at the Kendallville, Indiana facility. We are requesting this information to determine whether your emission source is complying with the Indiana State Implementation Plan and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production at 40 C.F.R. Part 63, Subpart RRR.

ART must send all required information to:

Attn: Compliance Tracker, AE-18J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

ART must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

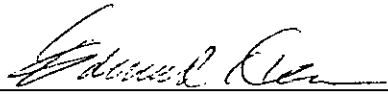
This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject ART to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Muhammed Shuaibi at (312) 353-2075 or shuaibi.muhammed@epa.gov.

1/22/18
Date



Edward Nam
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. “ACGIH Guidelines” shall refer to the references contained at 40 C.F.R. § 63.14(b)(1), (2), and (3).

Appendix B

Information You Are Required to Submit to EPA

Aluminum Recovery Technologies Inc. must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a):

1. Provide a copy of all permit applications submitted to Indiana Department of Environmental Management (IDEM) for the facility since January 1, 2008.
2. Provide copies of all annual emissions reports and semiannual excess emissions/summary reports submitted to IDEM for the facility from January 1, 2013 to the present, and include:
 - a. A narrative describing the method used for the annual emissions calculations for each pollutant, including the basis of any emissions factors used; and
 - b. Any documents outlining procedures for calculating annual emissions.
3. Provide a detailed, up to date, facility plant diagram(s) with the following information identified:
 - a. Air emission units;
 - b. Air pollution control equipment; and
 - c. Exhaust stacks for each respective piece of air pollution control equipment.
4. Provide a list of all emissions tests conducted at the facility for any reason, from January 1, 2013 to the date of receipt of this request, and provide copies of all emissions test reports. Emission testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. Use the following guidelines for compiling the list and preparing copies of the stack test reports:
 - a. List: Identify the emissions unit, the date of the test, the federal or state regulation requiring the test (if applicable), the test method(s) used, the physical location of the sample collection points (e.g., before or after emission unit or air pollution control device), and either the feed/charge weight rate or aluminum production weight rate of the associated emission unit, specifying the proportion of clean charge to scrap, if mixed. For each test during which the emission unit was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with IDEM.
 - b. Copies: Provide full stack test reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.

5. For the baghouses associated with Furnaces #1-4, provide a schematic of all ductwork associated with air flow from the furnace hood to the baghouse stack. Include the following information:
 - a. Ductwork dimensions (i.e. diameter and length)
 - b. Ductwork material
6. Provide all capture/collection system design calculations performed at the facility to establish and meet the engineering standards for minimum exhaust rates or facial inlet velocities as contained in the ACGIH Guidelines at 40 C.F.R. § 63.1506(c)(1).
7. For March 16, 2016 to the date of receipt of this request, provide copies of all annual inspections reports and flow rate measurements, using EPA Methods 1 and 2, or enclosure verification, using Method 204, of all emission capture, collection, and closed vent systems. If flow rate measurements are not conducted annually, specify and provide records related to any daily measurements that are recorded to maintain system operations. State the corresponding operating limit (average reading of a parametric monitoring instrument), citing the performance test upon which the operating limit is based, and note any deviations and corrective actions taken in accordance with 40 C.F.R. §63.1510(d).
8. Provide a copy of the Facility's Operation, Maintenance, and Monitoring (OM&M) Plan. Include all previous revisions and their corresponding dates.
9. Provide copies of all Preventative Maintenance Plans, including but not limited to Preventative Maintenance Plans required for the baghouses and the afterburner. Include all previous revisions and their corresponding dates.
10. Provide the following information for the rotary furnaces, identified as RF#1 and RF#2, from January 1, 2013 to the date of receipt of this request:
 - a. 3-hour block average inlet temperature for each fabric filter baghouse;
 - b. Maximum allowed fabric filter baghouse inlet temperature, the method used to establish the limit (e.g., performance test), and the effective date(s) of these temperatures;
 - c. Capture efficiency of the corresponding collection system, and all documentation used to calculate or estimate this value;
 - d. Records of daily inspections of the continuous lime injection system feed hopper, including daily records of the lime feeder setting;
 - e. Minimum lime feed rate established for each fabric filter baghouse during a performance test and the effective date(s) of these minimum feed rates;
 - f. Records of any blockages and/or deviation of the lime feeder setting from those used in the performance test, with a brief explanation of the cause of the blockage and/or deviation and the corrective action taken; and

- g. If lime feeder has been repaired or replaced, records of the new feeder calibration and the feed mechanism set points necessary to maintain the feed rate operating limit.
11. Provide the following information for the reverberatory furnace, identified as RV#1, from January 1, 2013 to the date of receipt of this request:
- a. 3-hour block average inlet temperature for each fabric filter baghouse;
 - b. Maximum allowed fabric filter baghouse inlet temperature, the method used to establish the limit (e.g., performance test), and the effective date(s) of these temperatures;
 - c. Capture efficiency of the corresponding collection system, and all documentation used to calculate or estimate this value;
 - d. Records of daily inspections of the continuous lime injection system feed hopper, including daily records of the lime feeder setting;
 - e. Minimum lime feed rate established for each fabric filter baghouse during a performance test and the effective date(s) of these minimum feed rates;
 - f. Records of any blockages and/or deviation of the lime feeder setting from those used in the performance test, with a brief explanation of the cause of the blockage and/or deviation and the corrective action taken; and
 - g. If lime feeder has been repaired or replaced, records of the new feeder calibration and the feed mechanism set points necessary to maintain the feed rate operating limit.
12. Provide the following information regarding all bag leak detection systems (BLDSs) in use at the Facility:
- a. The manufacturer's guidance documents, including, but not limited to, the manufacturer's written specifications and recommendations for operation and maintenance;
 - b. The manufacturer's guidance documents, including, but not limited to, the manufacturer's written specifications and recommendations, for establishing alarm set points and delay times;
 - c. All operation and maintenance documents developed by ART to establish alarm set points and delay times;
 - d. The emission point, air pollution control unit, and process associated with each BLDS;
 - e. The alarm set points and delays utilized by ART from the date of the installation of the BLDS to the date of receipt of this letter;

- f. The data used to justify each modification of an alarm set point and/or delay time and a narrative describing why each modification was appropriate;
 - g. The percentage of operating time the BLDS was in alarm during each 6-month reporting period from January 1, 2013 to the date of receipt of this request;
 - h. The number of total operating hours for each associated emission unit (i.e. RF#1, RF#2, RV#1) per month during each 6-month reporting period from January 1, 2013 to the date of receipt of this request;
 - i. Records of each alarm with the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken from January 1, 2013 to the date of receipt of this request; and
 - j. All pressure drop and/or visible emission readings performed whenever the BLDS was malfunctioning or down for repairs or adjustments from January 1, 2013 to the date of receipt of this request.
13. Provide the following information for the thermal chip dryer, identified as Chip Dryer #1, from January 1, 2013 to the date of receipt of this request:
- a. An Excel-compatible spreadsheet containing the total feed process weight rate, in tons, and the total operating hours per month;
 - b. 3-hour block average operating temperatures at the afterburner;
 - c. Minimum required operating temperature at the afterburner, the method used to establish the limit (e.g., performance test), and the effective date(s) of these temperatures;
 - d. 3-hour block average inlet temperatures at the fabric filter baghouse;
 - e. Maximum allowed fabric filter baghouse inlet temperature, the method used to establish the limit (e.g., performance test), and the effective date(s) of these temperatures;
 - f. Daily pressure drop readings, the method used to establish the limit (e.g., performance test), and the effective date(s) of these limits;
 - g. Afterburner inspection records and documentation regarding maintenance and/or any other improvements to the afterburner initiated based on finding from inspections;
 - h. Any ventilation studies associated with the thermal chip dryer and associated controls;
 - i. All documentation associated with calculated or estimated capture efficiency at the thermal chip dryer; and

- j. Daily visible emission notations of the Baghouse 3 exhaust (Vent #3) controlling Chip Driver #1.
14. Provide an Excel-compatible spreadsheet containing records of the total scrap aluminum processed (in tons), specifying whether the records are of feed/charge weight or aluminum production weight, partitioned by furnace (RF#1, RF#2, RV#1) for each month from January 1, 2013 to the present, including a 12 month rolling sum. Additionally, provide records of the total feed/charge weight or aluminum production weight (in tons), partitioned by furnace, for each 24-hour day of operation from March 16, 2016 to the date of receipt of this request.
15. Provide documentation from January 1, 2013 to the date of receipt of this request of any corrective actions taken to address any instance when process parameters or add-on air pollution control device operating parameters deviated from the value or range established during the performance test and incorporated in the OM&M plan.
16. Provide the following information for reactive flux usage at the Facility from January 1, 2013 to the date of receipt of this request:
- a. Safety Data Sheets for each flux;
 - b. A narrative describing how flux is weighed and added;
 - c. Records of any calibration of the flux weight measurement device; and
 - d. Records of the time, weight, and type of flux used, specifying to which furnace the flux is added, for each 15-minute block period during which reactive fluxing occurs, each operating cycle, or each time period used in the appropriate performance test. Specify the start time and end time to define each time period.
17. In ART's letter to IDEM dated December 27, 2016, ART described an incident that occurred during the October 2016 stack test of RF#1 as being caused by a "burb" in the baghouse controlling RF#1. Describe the incident. If you have determined the cause of the incident, what was the reason for the incident? Has the incident reoccurred as of the date of receipt of this request?
18. Identify all persons consulted in preparing the answers to this Request for Information including his/her title(s), the request(s) to which each individual responded, and the period of time for which each individual is providing a response.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by

Certified Mail, Return Receipt Requested, to:

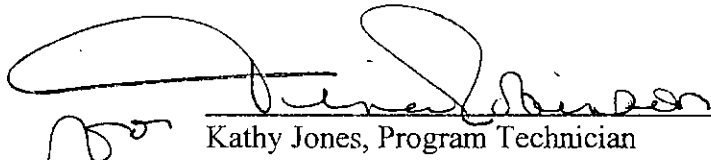
Farrell Norman
Aluminum Recovery Technologies Inc.
2170 Production Road
Kendallville, IN 46755

I also certify that I sent a copy of the Request to Provide Information Pursuant to the

Clean Air Act by E-mail to:

Phil Perry, Chief
Air Compliance and Enforcement Branch
PPERRY@idem.IN.gov

On the 23rd day of January 2018.


Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7660 10912